

## **EXHIBIT 7**

1 UNITED STATES DISTRICT COURT FOR THE  
2 SOUTHERN DISTRICT OF NEW YORK

3 GOVERNMENT OF THE UNITED : Case Number:  
4 STATES VIRGIN ISLANDS : 1:22-cv-  
Plaintiff, : 10904-JSR  
v. :  
5 JPMORGAN CHASE BANK, N.A. :  
Defendant/Third-Party :  
6 Plaintiff. :

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7 JPMORGAN CHASE BANK, N.A. :  
Third-Party Plaintiff, :  
8 v. :  
9 JAMES EDWARD STALEY :  
Third-Party Defendant. :

10  
11 - - -  
MAY 24, 2023  
12 HIGHLY CONFIDENTIAL  
- - -

13 Videotaped deposition of  
14 STEPHEN CUTLER, taken pursuant to notice,  
15 was held at the law offices of Boies  
16 Schiller Flexner LLP, 55 Hudson Yards,  
17 New York, New York, commencing at  
18 9:40 a.m., on the above date, before  
19 Amanda Dee Maslynsky-Miller, a Certified  
20 Realtime Reporter and Notary Public in  
21 and for the State of New York.

22 - - -  
23 GOLKOW LITIGATION SERVICES, INC.  
877.370.3377 ph| 917.591.5672 fax  
24 deps@golkow.com

1 investigations?

2 A. No.

3 Q. What is a Wells notice?

4 A. A Wells notice is a notice  
5 provided by the enforcement staff of the  
6 SEC to a person or entity, when the staff  
7 has drawn a preliminary conclusion that  
8 an enforcement action is warranted.

9 Q. Are you familiar with Towers  
10 Financial?

11 A. The name -- the name sounds  
12 familiar.

13 Q. Does the name Steve  
14 Hoffenberg sound familiar?

15 A. It does.

16 Q. Do you recall that before  
17 Bernie Madoff, Towers Financial was  
18 responsible for the largest Ponzi scheme  
19 in U.S. history?

20 A. I don't recall that.

21 Q. Do you recall anything about  
22 Towers Financial and Steve Hoffenberg  
23 being involved in a Ponzi scheme?

24 A. I mean, that rings a bell.

1 But I think you've now exhausted my  
2 recollection of the Towers Financial  
3 matter.

4 Q. Is the reason it might ring  
5 a bell is because Towers Financial and  
6 Steve Hoffenberg were prosecuted by the  
7 SEC?

8 Mr. EDELMAN: Objection to  
9 form.

10 THE WITNESS: It rings a  
11 bell that the SEC sued Towers  
12 Financial. And I can't say  
13 whether it also sued  
14 Mr. Hoffenberg. I just don't  
15 remember.

16 BY MS. LIU:

17 Q. Are you aware of the 2003  
18 Vanity Fair article, The Talented  
19 Mr. Epstein?

20 A. I don't know.

21 Q. Do you recall being sent a  
22 document that referenced that article  
23 when you were general counsel at  
24 JPMorgan?

1           A.     I don't have a recollection  
2 of that.

3           Q.     Are you aware that the  
4 article states that Jeffrey Epstein was  
5 said to have been involved with Towers  
6 Financial and Steve Hoffenberg?

7                     MR. GAIL:  Objection.

8                     THE WITNESS:  I don't recall  
9 that.

10  BY MS. LIU:

11           Q.     When you were head of  
12 enforcement at the SEC, you went after  
13 JPMorgan, correct?

14                     MR. GAIL:  Objection.

15                     THE WITNESS:  I know the SEC  
16 sued JPMorgan during my tenure at  
17 the SEC.

18  BY MS. LIU:

19           Q.     And what did they sue  
20 JPMorgan for?

21           A.     I believe it was a matter  
22 related to transactions that may have  
23 concerned Enron.

24           Q.     Right.  JPMorgan was alleged

1           A.     Yes.

2           Q.     And Bear Stearns had all but  
3 collapsed; is that your recollection?

4           A.     I think my recollection  
5 would be, I think, absent an acquisition,  
6 they might have collapsed.

7           Q.     And WilmerHale, the law firm  
8 representing JPMorgan here in this case,  
9 was also part of the legal team involved  
10 in the acquisition of Bear Stearns,  
11 correct?

12          A.     I don't -- I don't know  
13 that.

14          Q.     So it's possible, you just  
15 don't recall one way or the other?

16          A.     I just -- I actually  
17 remember our principal counsel being  
18 Wachtell Lipton.

19          Q.     Do you recall securities  
20 counsel being WilmerHale?

21          A.     In connection with the Bear  
22 Stearns acquisition?

23          Q.     Yes.

24          A.     I actually don't.

1           Q.     Okay. And you were aware  
2 and involved in discussions related to  
3 Jeffrey Epstein and Jeffrey Epstein's  
4 Financial Trust Corporation, or FTC's,  
5 lawsuit against Bear Stearns, correct?

6           A.     I wouldn't have known FTC or  
7 that doesn't sound familiar to me. But I  
8 remember having some involvement in  
9 Mr. Epstein's claims against Bear Stearns  
10 that we inherited as -- "we" being  
11 JPMorgan, inherited in connection with  
12 the Bear Stearns transaction.

13          Q.     Right. And so when you  
14 acquired Bear Stearns in 2008, was it the  
15 case that you understood Jeffrey Epstein  
16 had already sued Bear Stearns or was  
17 about to sue Bear Stearns? Do you  
18 recall?

19          A.     I don't recall that.

20          Q.     And what did you -- what do  
21 you recall Jeffrey Epstein was suing Bear  
22 Stearns over?

23          A.     I think it was principally  
24 around the drop in stock price, that Bear

1 Stearns had traded as high as, I don't  
2 know what, and ultimately when we  
3 acquired Bear Stearns it was at, you  
4 know, a much lower price than he had  
5 acquired the stock for.

6 Q. Do you recall that part of  
7 his lawsuit was related to losses for  
8 investments in asset-backed securities?

9 A. I don't -- I don't remember  
10 that. It's entirely possible that he was  
11 invested in a hedge fund, a Bear  
12 Stearns-sponsored hedge fund that had  
13 invested in asset-backed securities, I  
14 just can't remember.

15 Q. And you recall that the  
16 success of the Bear Stearns acquisition  
17 was important to JPMorgan?

18 A. Sure.

19 Q. And as the top lawyer  
20 involved in that acquisition, was it  
21 important to you?

22 A. Yes. I mean, we acquired  
23 Bear Stearns largely because the  
24 government of the United States wanted



1           A.       That's correct.

2           Q.       Do you know who Thomas Smith  
3   is? Thomas J. Smith, if that helps,  
4   working with Anne Verdon, possibly.

5                   Does that ring a bell?

6           A.       I would have said he may  
7   have been a lawyer at JPMorgan in the  
8   asset management area, but I can't  
9   remember.

10          Q.       I'm sorry, did you say a  
11   lawyer?

12          A.       I think so. I'm just not  
13   sure.

14          Q.       Do you recall if you ever  
15   had conversations with Thomas Smith  
16   related to Jeffrey Epstein?

17          A.       I don't recall.

18          Q.       Do you recall having  
19   conversations, in the 2009 time period,  
20   with Anne Verdon related to Jeffrey  
21   Epstein?

22          A.       In 2009? I don't recall  
23   that.

24          Q.       Who is Alan Greenberg?

1           A.       He was a former Bear Stearns  
2     senior executive. And then when we  
3     effected the transaction with Bear  
4     Stearns, he continued his association  
5     with the combined firm, if you will, on  
6     the broker side.

7           Q.       So he was with Bear Stearns,  
8     after the acquisition came over to  
9     JPMorgan, correct?

10          A.       Correct.

11          Q.       Do you recall that Alan  
12     Greenberg was specifically discussed in  
13     Jeffrey Epstein's lawsuit against Bear  
14     Stearns?

15          A.       I don't know.

16          Q.       Alan Greenberg went by the  
17     name Ace, correct?

18          A.       Correct.

19          Q.       Were you friends with him?

20          A.       No.

21          Q.       Who at JPMorgan, if you  
22     know, was Alan Greenberg close to?

23          A.       Oh, I don't know.

24          Q.       So you don't know if he was

1 friends with Mary Erdoes, for example?

2 A. I don't know that.

3 Q. Was he friends with Jamie  
4 Dimon?

5 A. I -- I don't know that.

6 Q. Was he friends with Jes  
7 Staley?

8 A. Not that I know of.

9 - - -

10 (Whereupon, Exhibit  
11 Cutler-14, JPM-SDNYLIT-00274324,  
12 8/11/10 E-mail, was marked for  
13 identification.)

14 - - -

15 BY MS. LIU:

16 Q. I'm handing you what has  
17 been marked as Exhibit-14.

18 So you'll see the bottom  
19 e-mail is from somebody named Todd Cook  
20 to Alan Greenberg.

21 Do you see that?

22 A. Yes.

23 Q. And Todd Cook is in  
24 JPMorgan's securities legal department.

1 Do you see that?

2 A. Yes.

3 Q. And he would have been  
4 someone who also reported up to you,  
5 correct?

6 A. I mean, yes, ultimately he  
7 would have reported -- he indirectly  
8 reported to me, that's correct.

9 Q. All right. So in -- in  
10 August of 2010 at this time Jeffrey  
11 Epstein, I think we confirmed, was still  
12 a client at JPMorgan, correct?

13 A. Correct.

14 Q. Todd writes, Alan, I'm  
15 following up on our conversation about  
16 Jeffrey Epstein. As mentioned, he is  
17 suing us over investments made in the  
18 Bear Stearns ABS and high-grade funds.

19 Do you see that?

20 A. I do.

21 Q. Does that refresh your  
22 recollection that there was a lawsuit by  
23 Jeffrey Epstein against Bear Stearns?

24 A. Yes.

1 Q. So then --

2 A. Well, I think I spoke too  
3 quickly.

4 I don't know whether he  
5 actually brought a lawsuit or he had just  
6 asserted claims. I just don't know. I  
7 see that this says he is suing us, but I  
8 don't -- I don't recall an actual  
9 lawsuit. It's possible.

10 Q. And you don't recall being  
11 involved in discussions, in June of 2008,  
12 related to potential litigation or  
13 anticipated litigation of Jeffrey Epstein  
14 versus Bear Stearns?

15 MR. GAIL: Did you say 2008?  
16 I'm sorry.

17 THE WITNESS: 2008?

18 MS. LIU: June of 2008.

19 THE WITNESS: I certainly  
20 recall discussions in 2008 about  
21 Bear Stearns' potential  
22 liabilities, including lawsuits or  
23 claims against Bear Stearns.

24 I don't recall discussions

1           about Jeffrey Epstein in that  
2           context in 2008.

3   BY MS. LIU:

4           Q.     I assume you haven't  
5   reviewed the priv log that JPMorgan  
6   provided to us in this case, correct?

7           A.     Correct.

8           Q.     Do you recall somebody by  
9   the name of David Weintraub --

10          A.     Yes.

11          Q.     -- at bear.com?

12          A.     Yes.

13          Q.     And do you recall that as  
14   early as June 11th of 2008 he was  
15   communicating with you related to  
16   rendering and discussing legal advice as  
17   prepared because of anticipated or  
18   current litigation regarding Epstein's  
19   Bear Stearns?

20          A.     I don't.

21          Q.     But you have no reason to  
22   doubt the accuracy that David Weintraub  
23   at Bear Stearns was e-mailing with you  
24   related to possible litigation by Jeffrey

1 Epstein in June of 2008?

2 MR. EDELMAN: Objection to  
3 form.

4 BY MS. LIU:

5 Q. Could that be true?

6 A. That Mr. Weintraub was  
7 communicating with me about potential  
8 litigation by Mr. Epstein concerning Bear  
9 Stearns matters?

10 Q. Correct.

11 MR. EDELMAN: The question  
12 is, could that be true?

13 THE WITNESS: Yes, it could  
14 have been true -- it could be  
15 true.

16 BY MS. LIU:

17 Q. And you recall June of 2008  
18 is the month and year that Jeffrey  
19 Epstein pled guilty and became a  
20 convicted felon, correct?

21 A. I know that, yes.

22 Q. And so brewing at the same  
23 time that he is being kept on at the bank  
24 is a lawsuit that he has against Bear

1 Stearns, correct?

2 MR. GAIL: Objection.

3 THE WITNESS: If I  
4 understand your question, at the  
5 same time that he is potentially  
6 asserting claims against Bear  
7 Stearns, he is also pleading  
8 guilty to the crimes he pled  
9 guilty to, that lines up.

10 BY MS. LIU:

11 Q. Right. And it also lines up  
12 that it's the same time period that the  
13 company had a decision to make about  
14 whether or not to retain Jeffrey Epstein  
15 as a client, and they did so, correct?

16 A. Correct.

17 Q. So if you look at the top of  
18 the exhibit I just shared with you --

19 A. Yes.

20 Q. -- you'll see Dominique  
21 Pranito e-mails you on 8/11/2010 and  
22 says, Alan Greenberg just called and  
23 wants to know -- and then there's a  
24 redaction -- see details below.



1 Do you see that?

2 A. I do.

3 Q. So, presumably, Alan  
4 Greenberg called related to something  
5 about Jeffrey Epstein and the lawsuit; is  
6 that fair?

7 MR. GAIL: Objection.

8 THE WITNESS: I don't know.

9 BY MS. LIU:

10 Q. Who is Dominique Pranito?

11 A. My assistant. I should say  
12 she was my assistant.

13 - - -

14 (Whereupon, Exhibit  
15 Cutler-15, JPM-SDNYLIT-00009597,  
16 8/26/10 E-mail, was marked for  
17 identification.)

18 - - -

19 BY MS. LIU:

20 Q. I'm handing you what has  
21 been marked as Exhibit-15.

22 You'll see this is an e-mail  
23 from Jeffrey Epstein,  
24 jeevacation@gmail.com, to Jes Staley on

1 August 26th, 2010.

2 Do you see that?

3 A. I do.

4 Q. And this says, Steve Cutler  
5 sent Alan Greenberg a note telling him  
6 you and I settled, question mark,  
7 question mark, question mark. I haven't  
8 seen anything since our conversation,  
9 period, question mark, question mark.

10 Do you see that?

11 A. I do.

12 Q. Do you recall sending Alan  
13 Greenberg a note or a communication  
14 around this time?

15 A. I do not.

16 - - -

17 (Whereupon, Exhibit  
18 Cutler-16, JPM-SDNYLIT-00274402,  
19 9/24/10 E-mail, was marked for  
20 identification.)

21 - - -

22 BY MS. LIU:

23 Q. I'm handing you what has  
24 been marked as Exhibit-16.

1                   So you'll see from the top  
2 e-mail this is, approximately, a month  
3 later from the last e-mail we looked at.  
4 It's from Melissa Getler to you, Stephen  
5 M. Cutler, 9/24/10.

6                   Do you see that?

7           A.       I do.

8           Q.       Who is Melissa Getler?

9           A.       I think she was a litigator,  
10 but I'm not positive.

11          Q.       So she worked for --

12          A.       She was -- she was in the  
13 legal department. I just don't recall  
14 which area.

15          Q.       So you'll see the bottom  
16 e-mail is from Jeffrey Epstein to Jes  
17 Staley, Please forward to Cutler?

18          A.       I do.

19          Q.       Do you see that?

20          A.       Yes.

21          Q.       And then Jes Staley forwards  
22 you something, and it's redacted,  
23 privileged.

24                   Do you see that?

1           A.     I see that.

2           Q.     And you forward it to  
3   Melissa Getler.

4                   Do you see that?

5           A.     I do.

6           Q.     And then she writes  
7   something to you that we can't see  
8   because it's redacted.

9                   Do you see that?

10          A.     I do.

11          Q.     Okay.  So do you recall that  
12   Melissa Getler was also involved in  
13   discussions related to the litigation  
14   that Jeffrey Epstein had against Bear  
15   Stearns?

16          A.     I don't have an independent  
17   recollection of that.  Seeing this  
18   document, that -- it's entirely possible  
19   that she would have been involved in  
20   litigation against -- or with  
21   Mr. Epstein.

22                               -   -   -

23                               (Whereupon, Exhibit

24                               Cutler-17,

1 JPM-SDNYLIT-00010065-080, 9/23/10  
2 E-mail, was marked for  
3 identification.)

4 - - -

5 BY MS. LIU:

6 Q. I'm handing you what has  
7 been marked as Exhibit-17.

8 You'll recall in the last  
9 exhibit, 16, the bottom e-mail was  
10 Jeffrey Epstein, September 23rd, with a  
11 please forward to Cutler to Jes Staley,  
12 right?

13 A. I do.

14 Q. Okay. So now you can see  
15 that this e-mail, which contains that  
16 same bottom e-mail, then forwards  
17 something to Jes Staley, which he then  
18 forwards to you, 9/23/2010, DKI 9/23  
19 draft FTC settlement agreement.

20 Do you see that?

21 A. I do.

22 Q. And do you recognize the  
23 initials DKI?

24 A. No.

1           Q.     Do you recall Darren K.  
2     Indyke being the lawyer for Jeffrey  
3     Epstein?

4           A.     I think I've seen documents  
5     recently that suggested that -- that  
6     Mr. Indyke was someone who was associated  
7     with Mr. Epstein. I don't -- I don't  
8     have any knowledge of that.

9           Q.     So, then, this -- if you  
10    turn to the first page of the attachment,  
11    you'll see there's a draft, Settlement  
12    agreement and release.

13                   Do you see that?

14          A.     I do.

15          Q.     And it's entered into by and  
16    among Jeffrey Epstein Financial Trust  
17    Company.

18                   Do you see that?

19          A.     I do.

20          Q.     And others -- and the Bear  
21    Stearns companies and some others.

22                   Do you see that?

23          A.     I do.

24          Q.     Does this refresh your

1 recollection in any way about the lawsuit  
2 that Jeffrey Epstein had brought against  
3 Bear Stearns?

4 A. I still don't know if there  
5 was an actual lawsuit, but I can read --  
6 I just read that first paragraph.

7 I don't know whether there  
8 was, in fact, a lawsuit or whether there  
9 were claims. But you may not be -- that  
10 distinction may not be important to you  
11 in your question. I just don't know.

12 Q. Well, it looks like, I think  
13 on the next page, it's referring to an  
14 arbitration proceeding. Maybe I'm  
15 calling that a lawsuit.

16 Is that fair?

17 A. I see that. And I wouldn't  
18 have known that either. But okay, I see  
19 that.

20 Q. So if you turn to Page 15 of  
21 this document, there's an Exhibit A.

22 A. Yes.

23 Q. And it says, Party, and it  
24 lists the three parties.

1 Do you see that?

2 A. I do.

3 Q. And it talks about fund,  
4 date, contribution.

5 Do you see that?

6 A. I do.

7 Q. And the contribution totals,  
8 for the three parties, approximately \$41  
9 million.

10 Do you see that?

11 MR. EDELMAN: Objection to  
12 form.

13 THE WITNESS: I do.

14 BY MS. LIU:

15 Q. Does that refresh your  
16 recollection in any way that Jeffrey  
17 Epstein was suing Bear Stearns over  
18 losses that were approximately \$41  
19 million?

20 MR. EDELMAN: Objection to  
21 form.

22 THE WITNESS: I don't think  
23 that's what it says.

24 BY MS. LIU:



1 Q. What does it say?

2 A. I would have to read the  
3 whole document, but I would read, if  
4 I'm -- I'm just focusing on Exhibit A,  
5 having not read the remainder of the  
6 document.

7 It looks like that's the  
8 amount that those parties invested.

9 Q. I'm sorry.

10 A. But I'm not sure.

11 Q. Okay. And that -- fair  
12 enough.

13 It looks like that's the  
14 contribution amount made by those parties  
15 in the Bear Stearns funds; is that fair?

16 A. That's what it -- that's  
17 what it looks like. I don't know if  
18 that's what is meant.

19 Q. Okay.

20 A. If you want me to study the  
21 document, I can study it.

22 - - -

23 (Whereupon, Exhibit

24 Cutler-18, JPM-SDNYLIT-00010100,

1     there.

2             A.     Okay.

3             Q.     Maybe not coincidentally,  
4     Todd called me about Epstein last week.

5                     Do you see that?

6             A.     I do.

7             Q.     Ace Greenberg wants to do  
8     business with him.

9                     Do you see that?

10            A.     I do.

11            Q.     And at this time, Ace, or  
12     Alan Greenberg, was already at JPMorgan,  
13     correct?

14            A.     Yes.

15            Q.     And he's the person we were  
16     talking about who was formerly with Bear  
17     Stearns, correct?

18            A.     Correct.

19            Q.     And I think you did not  
20     remember or recall, but he was named in a  
21     lawsuit that Jeffrey Epstein brought  
22     against Bear Stearns.

23                     Do you know that?

24            A.     That -- that Mr. Greenberg

1 was named in a lawsuit?

2 Q. He was -- there were  
3 allegations related to Mr. Greenberg in  
4 the lawsuit.

5 A. I don't recall that.

6 Q. Okay. Ace Greenberg wants  
7 to do business with him. I told Todd --  
8 and then there's a redaction.

9 Do you see that?

10 A. I do.

11 Q. So maybe Ace is pushing it.  
12 Do you see that?

13 A. I do.

14 Q. Did you know at this time,  
15 in 2010, that Alan "Ace" Greenberg wanted  
16 to do business with Jeffrey Epstein?

17 A. Well, I thought you showed  
18 me another e-mail that suggested that. I  
19 don't know.

20 I don't remember that.

21 Q. You're thinking about  
22 Exhibit --

23 A. Yeah, I see it says, Alan  
24 Greenberg just called and wants to know.

1 I don't know what it is that  
2 he wanted to know, because it's redacted.

3 Q. So I'm asking, at the  
4 time --

5 A. It may well be that  
6 Mr. Greenberg was doing brokerage  
7 business with Mr. Epstein. I just don't  
8 remember.

9 Q. So Melissa Getler writes  
10 back to James Condren, Okay. That  
11 provides some context, maybe. Thanks.

12 Do you see that?

13 A. I do.

14 Q. Okay. James Condren then  
15 forwards it to Todd Cook.

16 Do you see that?

17 A. I do.

18 Q. Todd Cook is another lawyer,  
19 right?

20 A. Yes.

21 Q. Todd Cook then forwards it  
22 to James Condren, Melissa Getler, Anne  
23 Verdon, Greg Quental.

24 Do you see that?

1           A.     I do.

2           Q.     Who is Greg Quental?

3           A.     I don't remember. I don't  
4 think he was a lawyer. I think he was a  
5 business person.

6           Q.     After we spoke -- this is  
7 Todd writing to James Condren, Melissa  
8 Getler, Anne Verdon and Greg Quental,  
9 August 16th, 2010.

10                   After we spoke, I realized  
11 that not only is Epstein suing us, but  
12 since he's a convicted felon, the  
13 approval of Cutler or Zubrow would be  
14 required by the firm's felon policy. It  
15 looks like Ace may have reached out to  
16 Cutler.

17                   Do you see that?

18          A.     I do.

19          Q.     Do you recall Mr. Greenberg  
20 reaching out to you on or about this  
21 time?

22          A.     I mean, I see this -- where  
23 is that e-mail?

24                   I mean, I see the -- this is

1 Exhibit-14, my assistant writing to me  
2 that Mr. Greenberg just called and wants  
3 to know something, and it relates to  
4 Jeffrey Epstein.

5 I don't -- I don't have an  
6 independent recollection of this. I  
7 believe -- I believe Mr. Greenberg was  
8 servicing the -- the Epstein account.

9 Q. And Melissa Getler writes to  
10 Todd Cook, James Condren, Anne Verdon,  
11 Greg Quental, We are in contact with  
12 Cutler on this.

13 Do you see that?

14 A. I do.

15 Q. And then Todd Cook writes  
16 back to Melissa Getler, Anne Verdon, Greg  
17 Quental, Did Ace go to him for an  
18 exception to the felon policy?

19 Do you see that?

20 A. I do.

21 Q. What was an exception to the  
22 felon policy?

23 MR. EDELMAN: Objection to  
24 the form.

1           requirement in the policy that we  
2           reviewed earlier today that says  
3           that it must go to Jamie Dimon  
4           somehow, if that's the policy that  
5           we're talking about.

6       BY MS. LIU:

7           Q.       I'm asking if you know, that  
8           if Alan Greenberg came to you and said, I  
9           want to do business with Jeffrey Epstein,  
10          I would like an exception to the felon  
11          policy, and you said okay, would that  
12          have to go up to Jamie Dimon for final  
13          blessing?

14                   MR. EDELMAN:  Objection to  
15                   form.

16                   THE WITNESS:  I don't  
17                   believe Mr. Greenberg came to me  
18                   and said we need -- I need an  
19                   exception to a felon policy.

20                   So I'm not sure I  
21                   understand, then, the -- how to  
22                   answer the question.

23       BY MS. LIU:

24           Q.       Melissa Getler, the person